

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Case No.: 10 cv 04703 SHS

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PITBULL PRODUCTIONS, Inc.,	:	
Plaintiff,	:	
v.	:	ANSWER TO
	:	COUNTERCLAIMS
	:	
	:	
	:	
FLAVA WORKS, INC.,	:	
Defendant.	:	
-----X		

Plaintiff Pitbull Productions, Inc. (“Pitbull”), by its attorneys Meredith & Keyhani, PLLC, answer the counterclaims as follows:

1. Except as hereinafter expressly admitted, qualified, or otherwise admitted, Plaintiff specifically denies each and every allegation, statement, matter and thing contained in Defendant's Answer and Counterclaims to Plaintiff's amended complaint.
2. Plaintiff lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 23.
3. Plaintiff lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 24, except to admit that Plaintiff has previously sued Lukebaby Productions, Inc.
4. Plaintiff lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 25.
5. Plaintiff lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 26.

6. Plaintiff lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 27.

7. Plaintiff denies the allegations contained in paragraph 28, as Tiger Tyson is of Black and Hispanic decent.

8. Plaintiff denies the allegations contained in paragraph 29.

9. Plaintiff denies the allegations contained in paragraph 30.

10. Plaintiff lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 31.

11. Plaintiff lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 32, as containing undefined terms.

12. Plaintiff admits the allegations contained in paragraph 33.

13. Plaintiff admits the allegations contained in paragraph 34.

14. Plaintiff admits the allegations contained in paragraph 35.

15. Plaintiff denies the allegations contained in paragraph 36.

16. Plaintiff admits the allegations contained in paragraph 37.

17. Plaintiff denies the allegations contained in paragraph 38.

18. Plaintiff denies the allegations contained in paragraph 39.

19. Plaintiff denies the allegations contained in paragraph 40.

20. Plaintiff denies the allegations contained in paragraph 41.

21. Plaintiff denies the allegations contained in paragraph 42.

22. Plaintiff denies the allegations contained in paragraph 43.

AFFIRMATIVE DEFENSES

23. Defendant's counterclaims fail to state a claim upon which relief can be granted.

24. Defendant's counterclaims are barred, in whole or in part, by unclean hands, and waiver.

Dated: September 14, 2010

Respectfully Submitted,

/s/ Jennifer Meredith
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